

Good morning Ms. Saare-Edmonds,

I attend and spoke at the public hearing on June 16<sup>th</sup> 2015.

I would like to make the following suggestions regarding the MWEL0 Revisions.

1. I think it is best to leave SLA at 1.0 Kc factor, there was a request to lower it to 0.8 and I disagree with that. I appreciate the state protecting areas open to play for the public as well as edible gardens.
2. I recommend the state show an example of a master planned community MAWA and ETWU, this will help a lot of designers and city plan checkers understand how to properly use the SLA for the greater good of the community. A lot of turf is a good thing if it is shared by a lot of families.
3. I disagree with the limitation on precipitation rates. I have included a video link of my personal garden irrigation. <https://www.hightail.com/download/bXBaOGNSZ1A1aWI0WjlVag>  
The system shown is a stream bubbler type that has a precipitation rate of over 3.0"/hr. I currently run it for 3 minutes 1 time a week in June. The pavers you see are on sand, and there is no runoff during a 3 minute cycle, this system is compliant under the current MWEL0. I truly hope this video shows the state that high precipitation rates do not equal wasted water. This system was installed 9years ago and I believe it is very effective in saving water. This design style should not be eliminated.
4. I am confused regarding the average efficiencies needing to be over 92%. I have never seen an efficiency over 90%(drip), and I design a lot of systems. So what do I use that is over 90% efficient? I don't think a 92% average is obtainable. I suggest lowering it or providing a sample of how I can design to meet the 92% criteria.

Thank you very much for your time.

Sincerely,

**Chris Curry** • Principal

**sweeney + associates**

IRRIGATION DESIGN AND CONSULTING